

Delaney, Sean (USAMD)

From: Leonard Bennett <lbennettesq@gmail.com>
Sent: Tuesday, December 19, 2017 10:55 AM
To: Delaney, Sean (USAMD)
Subject: Discovery Us vs. Shah 16-0430

Hi Sean;

With respect to my discovery requests, I wanted to let you know what I already have.

- 1.)(10) Ten DVD's marked E 01 thru E 010
- 2) Receipt For Surrender of Passport
- 3.) Presentence investigation report
- 4.) US Department of Justice plea agreement
- 5.) US probation pretrial services memo June 23, 2017
- 6.) Memo from US probation pretrial services February 28, 2017
- 7.) Application for warrant to seize property
- 8.) Subject to forfeiture of September 2, 2016
- 9.) Affidavit in support of application for searching and seizure warrant September 2, 2016
- 10.) Application for search warrant case number: 162174 and 162175 September 2, 2016
- 11.) Seized asset claim form
- 12.) Discovery agreement letter October 17, 2016
- 13.) Judgment in criminal case May 11, 2017
- 14.) Indictment
- 15.) Income tax records
- 16.) Food purchase record records

Other than this, please provide anything else requested ,which might be supplemental to this, including your witness list.

Thanks,

--
L. H. Bennett. Esq.
(PA License # 59108)



U.S. Department of Justice

United States Attorney
District of Maryland

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November 4, 2016

VIA U.S. MAIL

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Re: *United States v. Muhammad Rafiq and Mahmood Hussain Shah*
Criminal No. RDB-16-0430
 Discovery 2 – E10

Dear Counsel:

Pursuant to the discovery agreement in the above-captioned case, enclosed please find one disc numbered E10, containing the following:

CD/DVD#	Description
E10	Protected by password “16Crim0-4-3-0”, content includes a fully searchable PDF document with the following bates range: <ul style="list-style-type: none"> • Search Warrants SW-000001 – 000051 SAG16-1274-1276

Please note that the foregoing materials are of a private nature containing personal information which the government and all parties have a responsibility to protect from unneeded disclosure. Consequently, the foregoing materials are being provided to you on the condition that they not be copied, except for use by counsel, and that no copy will be provided to any defendant or to anyone outside counsel’s office, absent prior approval by the government.

Thank you. Please contact me with any questions.

Very truly yours,

Rod J. Rosenstein
United States Attorney

/s/
Aaron S.J. Zelinsky
Assistant United States Attorney

UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
Receipt for PropertyCase ID: 465-BA-6239485On (date) 08/30/2016item (s) listed below were:
 Collected/Seized
 Received From
 Returned To
 Released To(Name) COLENE GROCEY(Street Address) 1242 DARLEY AVE(City) BALTIMORE, MD 21218Description of Item (s): ① Activision Video system s/n: 0811157030073 ② Banking records ③ Statements + Documents ④ 2 Independence cards ⑤ Banking records + Journals w/ notes ⑥ Bank statements + Financial documents ⑦ Verifone POS s/n: 214 435 473 w/ powercardReceived By: DAN W
(Signature)Received From: NO ONE AVAILABLE
(Signature)

Printed Name/Title: _____

Printed Name/Title: _____